

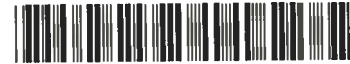
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**MCDONNELL DOUGLAS**



18 July 1985

Mr. Joe Galbraith  
Environmental Engineer  
Environmental Protection Agency, Region VII  
Waste Management Branch  
726 Minnesota Avenue  
Kansas City, Kansas 66101



R00136603  
RCRA RECORDS CENTER

Subject: Request for Temporary Emergency Permit

References: (a) R. H. Kaatman Letter to J. Galbraith dated 29 April 1985

(b) Teleconference dated 5 June 1985 - Representatives: Federal EPA Region VII - J. Galbraith; MCAIR - R. H. Kaatman, H. D. Rehkop, G. B. Saunders and GSX Services, Inc. - J. Smith

(c) Code of Federal Regulation (CFR) 40 Paragraph 270.61 Emergency Permits

Enclosure: (1) GSX Services, Inc. (Formerly Triangle Resources Industries) Proposal For Transport and Disposal of McDonnell Douglas Corporation Explosive Waste Material.

Dear Mr. Galbraith:

In pursuance of McDonnell Aircraft Company's (MCAIR) request of Ref. (a), Encl. (1) is being provided in compliance with Ref. (b) and (c). Additionally, in compliance with Ref. (b) and (c) the following expository information is provided which warrants why MCAIR feels that a temporary emergency permit should be granted for disposal of our Reactive Waste (explosive).

Commencing November 20, 1980 MCAIR has been storing Reactive Waste in our licensed storage facility and presently have accumulated 858.82 pounds of Net Explosive Weight (N.E.W.). The storage location is such, that the possibility for a substantial or potentially hazardous condition is significant when materials accumulate in large quantities. The proximity of Lambert St. Louis International Airport (runway 930 ft.) and Banshee Road (195 ft.) add to the potential hazard.

MCAIR's storage of explosive materials are not only governed by the Bureau of Alcohol, Tobacco, and Firearms guidelines but also Department of Defense (DOD) requirements. DOD regulations impose a Compatibility Group Storage Requirement for explosives. Some of the Reactive Waste presently stored in our facility are incompatible according to DOD guidelines. Hence, the granting of a temporary emergency permit would place MCAIR in compliance with DOD contractual regulations.

In order to eliminate the potentially hazardous condition and the compatibility problem of the Reactive Waste, MCAIR has performed the following systematic approach for disposal:

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- (1) Hazardous Materials Office pursued a legal Off-Site Disposal Facility - MCAIR has only been able to locate one (1) permitted Off-Site Disposal Facility who will accept our waste, site is seven (7) states away. Bid for disposal was in excess of \$400,000 and the proposed contract was to be performed by a subcontractor. Bid quote was renegotiated; disposal quote was still in excess of \$303,000. Disposal bid quote was calculated on price per pound of total item weight. Thus, MCAIR trying to reduce bid quote, submitted a letter to the Federal EPA Region VII requesting 20 mm Target Practice Ammunition, Class C Explosives be classified as being not "Reactive". If request would have been granted, bid quote would have been reduced by \$253,270 as the 20 mm Ammunition constitutes 78.84% of the total item weight of the Reactive Waste.
- (2) MCAIR has coordinated our disposal efforts with Naval Plant Representative Office (NAVPRO) at our St. Louis facilities. Coordination centered around the utilization of Navy facilities to dispose of the Reactive Waste. The reason for this approach, was, that of the total 858.82 lbs of the N.E.W. for disposal, 848.74 pounds of the N.E.W. or 98.83% is government - owned material. Nothing prevailed for this method, as all Navy facilities are permitted strictly for On-Site Disposal.
- (3) MCAIR has diligently worked with Missouri Department of Natural Resources (Mo DNR) to try and locate an On-Site Facility within the state who would accept our Reactive Waste for disposal. Of the facilities contacted, none were receptive; consequently, variance to the regulations was never requested.
- (4) Relocation of Reactive Waste to another storage facility - McDonnell Douglas Corporation's only other storage facility for Reactive Waste in the St. Louis metropolitan area is in St. Charles, MO; 20 miles away. The St. Charles storage site is restricted to temporary storage, less than 90 days. The only way MCAIR could legally move the Reactive Waste to the St. Charles Site for permanent storage is by means of a variance granted by the Mo DNR and Federal EPA Agency. Relocation would delay rather than solve the problem.

Consequently, based upon the sequence of action items described above, the only foreseeable way to alleviate the potential hazard to the general public and the compatibility problem is the issuance of a temporary emergency permit by the applicable regulatory agencies for disposal of the Reactive Waste. MCAIR is reluctant to pursue this avenue, but as we believe and you concurred by previous conversations, all other courses of action have been exhausted.

MCAIR, in order to eliminate future request for a temporary emergency permit, is pursuing the following avenues for disposal.

- o McDonnell Douglas Astronautics Co. - Titusville, FL is presently in the trial burn phase of obtaining an Off-Site Permit for disposal of Reactive Waste.
- o McDonnell Douglas Corporation - St. Louis, MO is in the feasibility phase of developing an On-Site Facility for disposal of Reactive Waste.
- o Continuously monitor Federal listing for Off-Site Permitted Facility to dispose of Reactive Waste.

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Enclosure (1) further explains procedures to be utilized by GSX Services, Inc. to ensure safe effective disposal of this material. We would greatly appreciate your approval of this proposal. Should you have any questions or comments, feel free to contact us at anytime.

Sincerely,



R.H. Kaatman, Acting Supervisor  
Environmental Compliance  
Sta.: (314) 232-3319



H.D. Rehkop, Branch Manager  
Hazardous Materials Control  
Sta.: (314) 234-7716

RK:tb

EC: Paul Meiburger, Mo DNR  
James Noles, GSX Services, Inc.